

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

LINDA RUFFIN, Individually and as Administrator of the Estate of Robert Sharp	)	CASE NO. 1:16-CV-640
	)	JUDGE PATRICIA A. GAUGHAN
	)	
Plaintiff,	)	
v.	)	<u>MOTION FOR AN ORDER FOR</u>
CUYAHOGA COUNTY, et al.,	)	<u>PLAINTIFF TO BE PERMITTED TO</u>
	)	<u>DISCLOSE CONFIDENTIAL</u>
	)	<u>INFORMATION TO THE FEDERAL</u>
	)	<u>BUREAU OF INVESTIGATION AND</u>
Defendants.	)	<u>THE U.S. ATTORNEY FOR THE</u>
	)	<u>NORTHERN DISTRICT OF OHIO</u>
	)	
	)	

Now comes Plaintiff by and through undersigned counsel and respectfully moves this Court for an Order for Plaintiff to be permitted to disclose confidential information to the Federal Bureau of Investigation and the U.S. Attorney for the Northern District of Ohio. Recent deposition testimony in this case, specifically from Tiante Blackman (the mother of the decedent's two youngest children), establishes two anonymous telephone calls were made to Ms. Blackman after decedent's death. The callers are believed by Ms. Blackman to be jail employees who were present inside the jail and jail dispensary at the time Robert Sharp was also inside the jail and the dispensary. The callers relayed disturbing information about what seems to amount to the deliberately indifferent provision of substandard medical care to the decedent, Robert Sharp, by Nurse Marcus Harris who is also a Defendant in this action.

The issues raised by these anonymous telephone calls and the information obtained from the callers raise legitimate concerns that Mr. Harris violated the decedent's civil rights and that

other employees inside the jail have information about Mr. Sharp. If the anonymous callers are accurate, the conduct of one or more jail medical staff amounts to punishment and intimidation of the decedent that could constitute a federal criminal civil rights violation.

Plaintiff, Decedent's Administratrix and mother, seeks to file an official Complaint with the Federal Bureau of Investigation ("FBI") regarding the potentially criminal conduct and violations of civil rights by the jail and medical staff towards the decedent. Plaintiff will need to support the Complaint with information, documents and deposition testimony deemed "Confidential" by the existing Protective Order.

Plaintiff, therefore, seeks an Order from this Court permitting the disclosure of information previously marked "Confidential" to the FBI. Plaintiff has not waived her legal rights to file such a Complaint under the existing Protective Order.

Respectfully submitted,

/s/ David B. Malik  
David B. Malik (0023763)  
Sara Gedeon (0085759)  
Malik Law  
8437 Mayfield Road, Suite #101  
Chesterland, Ohio 44026  
440-729-8260  
440-490-1177  
Dbm50@sbcglobal.net  
sgedeon1021@gmail.com

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 29, 2016, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ David B. Malik  
David B. Malik (0023763)